

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE SUNEDISON, INC.
SECURITIES LITIGATION

This Document Applies to:

In re TerraForm Global, Inc. Securities Litigation,
16-cv-07967-PKC, and consolidated cases

No. 1:16-md-02742-PKC
MDL No. 2742

**NOTICE OF UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

PLEASE TAKE NOTICE that Lead Plaintiff Pyramid Holdings, Inc. and Plaintiffs Iron Workers Mid-South Pension Fund and Simon Fraser (collectively, "Plaintiffs"), through Plaintiffs' counsel, on behalf of themselves and the Settlement Class (as defined herein), will hereby move this Court on a date and at such time as may be designated by the Honorable P. Kevin Castel, United States District Judge of the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, 10007-1312 under Federal Rule of Civil Procedure 23 for the entry of an order, substantially in the form attached to the Settlement Stipulation¹ as Exhibit A:

- (1) Preliminarily approving the proposed settlement as set forth in the Stipulation of Settlement dated December 14, 2017 (the "Settlement Stipulation"), filed concurrently herewith, resolving this Action against all Defendants in exchange for a payment of \$57 million for the benefit of the Settlement Class;
- (2) Preliminarily certifying a class (the "Settlement Class"), for settlement purposes only, of all persons who purchased or otherwise acquired the securities of

¹ Capitalized terms have the same meaning as in the Settlement Stipulation.

Terraform Global, Inc. in or traceable to its July 31, 2015 initial public offering of 45 million shares at \$15.00 per share;

- (3) Appointing Garden City Group as Claims Administrator;
- (4) Approving the form and manner of disseminating notice to the Settlement Class;
- (5) Scheduling a hearing to consider final approval of the Settlement, the Plan of Allocation and an award of attorneys' fees and expenses; and
- (6) Setting deadlines for the dissemination of notice, the submission of proofs of claim and requests for exclusion, the filing of objections, and the filing of Plaintiffs' Counsel's motion for approval of the Settlement and application for attorneys' fees and expenses.

This motion is based on this Unopposed Motion, the Settlement Stipulation and the Exhibits thereto (filed contemporaneously herewith), Plaintiffs' supporting Memorandum of Law (filed contemporaneously herewith), the Court's docket in this Action, and any other information the Court may request. Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiffs request that the Court enter the proposed Order of Preliminary Approval of Settlement.

Dated: December 15, 2017

Respectfully submitted,

ABRAHAM, FRUCHTER & TWERSKY, LLP

/s/ Jack G. Fruchter

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